



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 18 2015

CERTIFIED MAIL 7009168000076693479
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Ms. Holly Donohue
Environment, Health, and Safety Regional Manager
400 Main Street
Mail Stop 124-26
East Hartford, Connecticut 06118

Re: Notice of Violation
Compliance Evaluation Inspection
Pratt & Whitney AutoAir, Inc.
5640 Enterprise Drive
Lansing, Michigan 48911
EPA ID No.: MID005343512

Dear Ms. Donohue:

On August 19, 2015, a representative of the U.S. Environmental Protection Agency inspected the Pratt & Whitney AutoAir, Inc., ("P & W") facility located in Lansing, Michigan. As a large quantity generator of hazardous waste, P & W is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate P & W's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by P & W, EPA's review of records pertaining to P & W, and the inspector's observations, EPA has determined that P & W has unlawfully stored hazardous waste without a license or interim status as a result of P & W's failure to comply with certain conditions for a license exemption under Mich. Admin. Code r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which P & W was out of compliance at the time of the inspection in the paragraphs below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSDF requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code r. 299.9601(1)-(3) and 299.11003(1)(p) and (q), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSDF requirement. The exemption conditions identified in paragraphs 4-7 are also independent TSDF requirements incorporated from Mich. Admin. Code r. 299.9601(1)-(3)

and 299.11003(1)(p) and (q). Accordingly, each failure of P & W to comply with these conditions is also a violation of the corresponding requirement in Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Mich. Admin. Code. r. 299.9601(1) and (2) and 299.11003(1)(m) – (o) [40 C.F.R. Part 264] (if the facility should have been licensed).

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSDF REQUIREMENTS

At the time of the inspection, P & W was out of compliance with the following large quantity generator license exemption conditions:

1. Date When Each Period of Accumulation Begins

Under Mich. Admin. Code r. 299.9306(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins. In the State of Michigan, it is further required under Mich. Admin. Code. r. 299.9306(1)(b) that containers used to store hazardous waste must also be labeled or marked with the hazardous waste number of the waste.

At the time of the inspection, P&W was storing nine bags of paint booth filters, six 55-gallon drums of grinder dust, seven cardboard boxes of filters contaminated with chromium, and one 55-gallon drum of downdraft dust contaminated with chrome in the 90-day hazardous waste accumulation area. The nine bags of paint booth filters were marked neither with the date upon which each period of accumulation began, nor with hazardous waste numbers. The remaining containers of hazardous waste were also not marked with their respective hazardous waste numbers.

2. Hazardous Waste Container Labeling

Under Mich. Admin. Code r. 299.9306(1)(c) [40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, the nine bags of paint booth filters identified in item 1, above, were not labeled with the words "Hazardous Waste."

3. Satellite Accumulation Area

Under Mich. Admin. Code r. 299.9306(2) [40 C.F.R. § 262.34(c)(1)], a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste.

At the time of the inspection, hazardous wastes generated from a paint booth located between cells I3 and I4 were being taken to containers of hazardous wastes that were satellites for other processes and were not at or near the point of generation for this paint booth.

The license exemption conditions identified below in paragraphs 4-7 are also independent TSDF requirements violated by P & W:

4. Use and Management of Containers

Under Mich. Admin. Code. r. 299.9306(1)(a)(i), 40 CFR § 265.174 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.174], a large quantity generator must inspect at least weekly areas where containers of hazardous waste are stored. In the State of Michigan, it is further required under Mich. Admin. Code. r. 299.9306(1)(a)(i) that records of these inspections are to be maintained at the facility for three years since the date of the last inspection.

At the time of the inspection, P & W maintained a record of inspections that were being conducted in the 90-day hazardous waste accumulation area. However, inspections for the month of April, 2015 were not in the record (4/2/2015 through 5/1/2015) and the most recent inspection on record was from 7/17/2015.

5. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Mich. Admin. Code. r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Mich. Admin. Code. r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- A written job description for each position at the facility related to hazardous waste management;
- A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

- Records that document that the training or job experience described above has been given to and completed by facility personnel. *See Mich. Admin. Code. r. 299.9306(1)(d), 40 C.F.R. § 265.16(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].*

At the time of the inspection, P & W could not immediately provide the following information:

- a list of each position at the facility related to hazardous waste management and the name of the employee(s) filling such position(s);
- a written description for each position related to hazardous waste management at the facility;
- a written description of the type and amount of introductory and continuing training given to employees with duties related to hazardous waste management; or
- Records that document training or job experience had been given to and completed by facility personnel, namely, but not limited to, Tim Terry who manages the hazardous waste from the satellite accumulation areas to the 90-day areas and Gary Frank, the emergency coordinator for the site.

6. Preparedness and Prevention

Under Mich. Admin. Code. r. 299.9306(1)(d), 40 C.F.R. part 265, subpart C [40 C.F.R. §§ 262.34(a)(4) and 265.35], a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

At the time of the inspection, aisle space in the 90-day hazardous waste accumulation area was inadequate. Containers and bags of waste were staged immediately next to one another.

7. Contingency Plan and Emergency Procedures

Under Mich. Admin. Code r. 299.9306(1)(d), 40 C.F.R. part 265, subpart D [40 C.F.R. §§ 262.34(a)(4) and 265.54(d)], the facility contingency plan must be reviewed, and immediately amended, if necessary, whenever the list of emergency coordinators changes.

At the time of the inspection, the list of emergency coordinators in the contingency plan included Carol Hoy-Light as an alternate. Ms. Hoy-Light had vacated this role approximately three weeks prior to the inspection.

Summary of license exemption conditions: By failing to comply with the conditions for a license exemption above, P & W became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste storage license. P & W failed to apply for such a license. P & W's failure to apply for and obtain a hazardous waste storage license violated

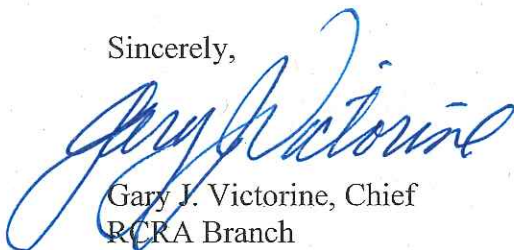
the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(p) and (q) is also an independent violation of the corresponding TSDF requirement.

At this time, EPA is not requiring P & W to apply for a Michigan hazardous waste storage license so long as it immediately establishes compliance with the conditions for a license exemption outlined above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at whitney.brenda@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Bryan Grochowski, MDEQ (grochowskib@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)
Bryce Feighner, MDEQ (feighnerb@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection: August 19, 2015

Facility Name: Pratt & Whitney AutoAir, Inc.

Facility Address: 5640 Enterprise Drive
Lansing, Michigan 48911

EPA RCRA ID Number: MID005343512

Generator Status: Large Quantity Generator

Facility Contact: Holly Donohue – EHS Regional Manager

U.S. EPA RCRA Inspector: Brenda Whitney - Environmental Engineer
Land and Chemicals Division
Resource Conservation and Recovery Act (RCRA) Branch
Compliance Section 2

Prepared By:


Brenda Whitney – Environmental Engineer

10-1-15
Date

Approved By:


Julie Morris – Chief, Compliance Section 2

10/1/15
Date

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or “Inspection”) of the Pratt & Whitney AutoAir, Inc., facility (“P&W”) located in Lansing, Michigan on August 19, 2015. This CEI was an evaluation of P&W’s compliance with the RCRA hazardous waste regulations codified in the Michigan Administrative Code and the Code of Federal Regulations. The Facility has notified as a large quantity generator of hazardous waste generating more than 1,000 kilograms of hazardous waste per month. Bryan Grochowski of the Michigan Department of Environmental Quality was unable to participate in this CEI.

Participants

Courtney Blatti – Consultant to P&W	Bureau Veritas NA, Inc.
Bruce Gallagher – Facilities Manager	P&W
Holly Donohue – Regional EHS Manager	P&W
Brenda Whitney – Environmental Engineer	U.S. EPA

Introduction

Upon arrival at P&W at 8:25 a.m., I signed in at the front desk and verified that I was a U.S. Citizen by presenting my credentials. The front desk attendant contacted the EHS group. Mr. Gallagher and Ms. Blatti met me at the front entrance and led me to the EHS manager's office for an introductory meeting. The EHS manager had left the company less than three weeks prior to the inspection, so the office was still vacant. I delineated the purpose and logistics of the CEI to the P&W representatives, and we discussed P&W's hazardous waste generation sources and management methods. I informed the representatives that I would be taking photographs during the CEI as needed. I provided the following compliance assistance documents; *Michigan Retired Engineers Technical Assistance Program (RETAP) sheet (MDEQ brochure)*; *P2 Technical Assistance Contacts*; and *U.S. EPA Small Business Resources*. We discussed the procedures EPA uses for controlling confidential business information. After being given an overview of the processes and waste generation sources by the facility representatives, I was escorted on a walking tour of the facility before returning to office to review records. Ms. Donohue was able to join the inspection at this time. Upon completion of the CEI, I held a closing conference with P&W representatives.

Site Description

The following information about P&W is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.

P&W is a subset of the main company, Pratt & Whitney, which it turn is owned by United Technologies Corporation (UTC). This site consists of three main buildings that operate under the same EPA Identification Number (EPA ID). An additional site exists across the street; however, this site operates under a separate EPA ID. I did not inspect that additional site. The total square footage of the facility was not determined during the inspection as there were conflicting numbers presented by facility personnel and in the contingency plan. According to the site plans, plants 1, 2 and 3 are 22,326 ft², 17,748 ft², and 23,759 ft², respectively. According to the contingency plan, plants 1, 2, and 3 are 46,600 ft², 28,000 ft², and 26,000 ft², respectively. The facility was built after 1980. The employees at the facility work a basic schedule in two shifts five days a week from 6 – 2:30pm and 2pm - 10pm. Some employees work overtime on Saturday. No one is at the facility on Sundays.

P&W is an overhaul and repair site for aircraft equipment. Equipment, typically airplane engines, received from customers is torn down, cleaned, repaired, and painted again. In Plant 1, components are grinded down to bare substrate. The grinding dust and filters are managed as hazardous waste for potential chromium content which may be present in the removed paint. Blast units are also used to strip the components. The waste from these units are managed as both hazardous and non-hazardous wastes, depending on analyses that have been conducted for each unit.

Next, if the components have a metallic substrate such as stainless steel, aluminum and titanium, versus carbon fiber, graphite, Kevlar, or fiber glass, the components are cleaned in a phosphoric acid dip tank system called the "Phosphoric Acid Anodizing" or PAA line. The waste water generated from the rinse tanks in this system is treated by elementary neutralization in an on-site tank prior to removal from the site by Safety Kleen as a non-hazardous waste. In the event that a dip tank needs to be changed out completely, the waste carries the D002 and D007 waste numbers. Solids are not generated from this process and P&W does not have a filter press on site.

After the PAA process, the cleaned components are repaired, then they are primed and repainted in paint booths. Paint booth filters and related paint wastes are managed as hazardous waste. P&W manages liquid paint waste generated from cleaning paint guns and lines as a separate waste stream and separate point of generation from the waste paint cups, contaminated PPE, and other paint or solvent contaminated solids. Paint filters are considered a third point of generation.

Autoclaves are utilized in this plant for the purpose of compacting carbon fiber components under high vacuum pressure.

Plant 2 houses the research and development group as well as repair units. They have metal fabrication areas as well as paint booths. Used oils are generated in the metal fabrication area and machine shop. A cleaning unit in this plant uses a surfactant and generates non-hazardous wastewaters.

Plant 3 is used particularly for the repair of thrust reversers, nozzles, and blocker doors. A media blast booth in this plant uses plastic beads which are managed as either hazardous or non-hazardous waste depending on the items that are blasted. Paint booths are also in this plant as well as a massive autoclave.

Hazardous and universal wastes and used oils generated at the facility are stored in a shed on the west side of the property which serves as the 90-day accumulation area. Wastewaters generated from the PAA are removed directly from the PAA room.

Other wastes generated at the facility include Blue Ice (non-hazardous), shop towels (non-hazardous), condensate water (non-hazardous) and aerosol can waste (hazardous).

Site Tour

The tour began in Plant 1. I observed grinding tables, also known as down-draft tables. Containers of waste for these tables were stored inside a cabinet beneath the table. The cabinet doors were labeled as "Hazardous Waste" and marked with the D007 waste number. I also observed a blast unit which utilized aluminum oxide as the blast media. This waste was being managed as a non-hazardous waste. A 2-gallon "day-can" for wipes was on a shelf near one of the grinding tables (See Appendix A: Photograph 1). According to Ms. Blatti, the wipes are pre-moistened with either isopropanol or acetone. There are no free liquids in the containers, and they are managed as non-hazardous waste. Any other rags that are used in the plant, she explained, are laundered through Brent Industries.

Each plant is broken down into cells. A paint booth located between cells I3 and I4 was generating hazardous waste materials contaminated with paint as well as liquid waste paint/solvent and gun cleaner. All of the paint booths throughout the facility generated the same two waste streams. This booth, however, did not have accumulation containers of its own. The waste from this booth is taken to other booths across the plant, mostly to the booth located between H4 and H5. This booth did not appear to be at or near the booth generating the waste. The other locations are farther.

I observed all of the waste accumulation areas in Plant 1, with the exception of the Alodine Rinse waste in the PAA room. Accumulation points are identified with numerical codes. Each of the containers of paint-related hazardous wastes was labeled as "Hazardous Waste" and marked with descriptors such as "Waste Paint" or "Waste Paint Cans – Cups." In three instances, containers of these two waste streams were co-located: containers 1-2 and 1-2A, 1-3 and 1-3A, and 1-23 and 1-23A. Each container was 55-gallons in size and appeared to be at or near the point of generation. P&W manages each container in these sets of drums as separate satellite accumulation areas from different points of generation.

An aerosol can-puncturing unit (container 1-4) was also located in Plant 1. This drum was marked as "Hazardous Waste" and "Paint." In this same room was a compaction unit for spent cylindrical filters which are stored in 55-gallon drums (no container number yet). Without compaction, only one filter fits in each drum. The compactor had not been installed yet. The drum in the unit, however, was labeled as "Hazardous Waste" and "Filters with Chrome."

I also observed the PAA unit on the south side of this plant. The line includes the following process tanks: Phosphoric acid deoxidizing bath; deionized water; phosphoric acid anodizing bath; deionized water; and final rinse. The tanks are positioned over secondary containment. The operator in this area did not mention any containers of waste, though I found out later in the inspection that they do generate an Alodine waste in this area.

The inspection continued outside to a pole barn west of Plant 1 that was used for random storage. I walked around this storage area and did not observe hazardous waste.

Just north of this barn was the 90-day hazardous waste storage area ("90-day HWSA"). The storage area is a shed that is bifurcated into the hazardous waste area and raw chemical storage

area (See Appendix A: Photograph 2). I observed nine garbage bags of paint booth filters (See Appendix A: Photograph 3). These bags were not labeled. The paint booth filters are hazardous wastes. Mr. Tim Terry manages the waste in this area and stated that he had just picked up the bags of waste that morning from their respective satellite accumulation areas and had not had a chance to re-containerize them. I also observed six 55-gallon drums of grinder dust. The containers were each dated from 7/18/2015 and were labeled as "Hazardous Waste." No waste numbers were marked on the labels. Seven cardboard boxes were holding "Filters w/Chrome" (See Appendix A: Photograph 4). Each box was dated from 8/10/15 and labeled as "Hazardous waste. Waste numbers were not marked on the labels. One container of "Universal Waste – Batteries" was dated from 10/16/14. One 55-gallon drum of "Downdraft – Dusty with Chrome" was labeled as "Hazardous Waste" and marked with a start date of accumulation from 7-18-2015 (See Appendix A: Photograph 5). The container was not marked with a waste number.

Also in the 90-day HWSA, were four 55-gallon drums of solvent rags/wipes, two 55-gallon drums of blast media, and one drum of condensate water. These waste streams are managed as non-hazardous. In the raw chemical storage area was one closed 4-foot box of universal waste lamps labeled as "Used Electric Lamps" dated from 8/14/15.

Aisle space in the 90-day HWSA was minimal. The secondary containment consisted of a grate over a 200-gallon concrete sump that was lined with a 3mm black plastic lining that was lifting in some areas. The area is also angled upward to prevent the outflow of wastes and the inflow of precipitation. Safety Equipment was available in the area including a pull down fire alarm, spill kit and over pack drum, fire extinguishers, and a phone (See Appendix A: Photograph 6). Placards for the transporter were also available in the area.

Another barn was located behind the 90-day HWSA. I looked around this barn and did not observe any hazardous waste.

As we were walking outside toward Plant 2, I noticed an insulated part of Plant 1 that I had not inspected. P&W maintains a large room-sized freezer for adhesives, foams and fabrics. Carbon fiber fabric has a shelf-life and must be kept in freezing temperatures before it is used. Near this area by the tool crib, I also observed a 5-gallon bucket of "Universal Waste – Batteries" (container 1-21).

Inside Plant 2, I observed a poly tote of used oil less than 250-gallons in size. The tote was labeled as "Used Oil" (container 2-8). Inside a paint booth, were two 55-gallon drums labeled as "Hazardous Waste" and "Liquid Waste Paint" and as "Waste Paint Cans – Cups," respectively (containers 2-1 and 2-1A). Further along this aisle was one 55-gallon drum of hazardous blast media labeled as "Hazardous Waste" and "Downdraft/Media Blast" (container 2-9). A 55-gallon drum in the Cone Segment Cell was labeled as "Hazardous Waste" and "Waste Paint Cans – Cups" (container 2-4). A 55-gallon drum in the Fan Blade Cell was marked in the same manner (container 2-11). In the southeast area of the plant, I observed a container marked as "Residue from Aerosol Can Puncturing" which was also labeled as "Hazardous Waste" (container 2-2). A 5-gallon bucket of batteries outside the tool crib was labeled as "Used Batteries" and "Universal Waste" (container 2-10). The bucket was dated from 2-6-15.

The inspection proceeded to Plant 3. Near a cup-gun painting assembly was one 55-gallon drum labeled as "Hazardous Waste" and "Waste Paint Cans" (container 3-6). One 5-gallon bucket of "Universal Waste Used Batteries" was located outside of the tool crib as was one 55-gallon drum labeled as "Residue from Aerosol Can Puncturing" and "Hazardous Waste" (containers 3-9 and 3-4). Outside of the paint booth near the autoclave on the northwest side of the plant were two 55-gallon drums of "Liquid Waste Paint" and "Waste Paint Cans – Cups" (containers 3-1 and 3-1A). Both containers were labeled also as "Hazardous Waste." In the spray wash booth for thrust reversers was a tote of wastewater labeled as "Non-Hazardous Waste" (container). In the north corner of the plant was one 55-gallon drum for "Used Oil" (container 3-10).

End of Tour

Records and Emergency Preparedness Review

Preparedness and Prevention: The Facility is equipped with internal communications and alarm systems. Phones are available for external communications to summon emergency assistance. In addition to a plant-wide fire suppression system, portable fire extinguishers and spill control equipment are located throughout the Facility and near the 90-day hazardous waste storage area. Emergency equipment is tested and maintained according to a schedule. Aisle space was minimized in the 90-day storage area. Arrangements with local emergency authorities have been made.

Contingency Plan:

- A list of emergency coordinators was included. Gary Frank, Engineering Manager, was listed as the primary coordinator and Carol Hoy-Light, former EHS Manager, was listed as the alternate. Ms. Hoy-Light is no longer in this role. She departed the company less than 3 weeks prior to the inspection. The list of coordinators includes office phone numbers and addresses. The role of the coordinators is explained in the plan.
- The plan includes emergency evacuation information and emergency equipment lists complete with descriptions, capabilities, and locations.
- A list of contact information for local emergency responders includes a description of arrangements made with those responders.
- The plan was last submitted on October 20, 2014 to the following entities: MDEQ; City of Lansing Police Department; Sparrow Hospital, Ingham County Local Emergency Planning Committee, and Safety Kleen.

Training: Training records for the following employees were requested and reviewed:

- Tim Terry manages the physical control of the hazardous waste from satellite to signing manifests. He performs this duty on a volunteer basis. His job duties are not formally written under his job description as those descriptions are negotiated through the union.
- Records for the emergency coordinator for the site, Gary Frank, were not immediately available.

Manifests: Three years of hazardous waste manifests were available for review. Land disposal restriction (LDR) forms were also available for review.

Inspections: Inspections were being conducted in the 90-day hazardous waste storage area. Inspections for the month of April were not in the record (4/2/15 through 5/1/15). The most recent inspection was conducted on 7/17/15.

Waste Determinations: Waste determinations have been made through testing and generator knowledge for paint-related wastes, grinding dust, blast media, and PAA wastes.

Closing Conference

The following items were discussed with P&W personnel at the close of the inspection:

- Confidential Business Information (CBI) – It was determined that I did not collect information or photographs that were to be managed as CBI.
- Satellite accumulation requirements;
- 90-day container accumulation requirements; and
- Training requirements.

List of Appendices

- Appendix A: Photograph Log
- Appendix B: Checklists
- Appendix C: Documents Received During the Inspection
- Appendix D: Post-Inspection Information Requested of and Received from facility.

Appendix A

Photograph Log

Inspection Date:

August 19, 2015

Facility Name and ID Number:

Pratt & Whitney Autoair, Inc.

MID005343512

Inspector and Photographer:

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

Camera Used:

Olympus Stylus 600

Serial Number: A47525904



Photograph 1 – A 2-gallon “day-can” for wipes was on a shelf near one of the grinding tables in Plant 1. The wipes are pre-moistened with acetone or isopropanol and do not have free liquids.



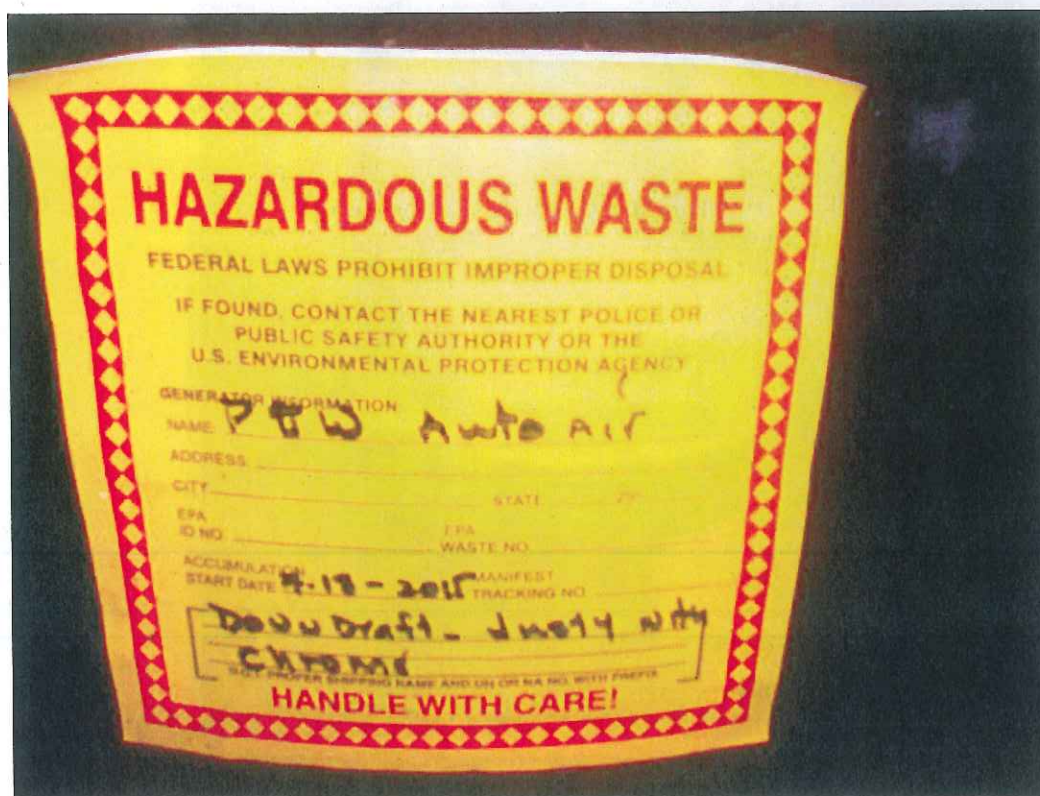
Photograph 2 – Overview of the 90-day hazardous waste storage area.



Photograph 3 – Paint-related wastes (filters) were stored in bags in the 90-day storage area. These bags had been removed from the satellite areas that morning. The operator stated that he was in the process of collecting the bags during the inspection. These bags were not labeled.



Photograph 4 – This photograph is oriented on its right side. Boxes of "Filters w/ Chrome" were marked with start dates of accumulation on "Hazardous Waste" labels. Waste numbers were not marked.



Photograph 5 – One drum of hazardous “Downdraft – Dusty with Chrome” was in the 90-day storage area. This container was not marked with a waste number.



Photograph 6 – Safety and emergency equipment was located at the 90-day storage area.



Photograph 7 – This photograph shows an example of waste accumulation containers near a paint booth in Plant 3. The waste drums are the two containers at the ends which have funnels on top.

Appendix B

Checklists

Inspection Date:

August 19, 2015

Facility Name and ID Number:

Pratt & Whitney Autoair, Inc.

MID005343512

Inspector:

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

**Department of Environmental Quality
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM**

Facility's Name PRATT & WHITNEY AUTOMotive Part 3 Rules

Date 8/19/2015 ID# MID005343512 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
Paint liquids 0001/0003/0008/0035	PAINT BOOTHs	} > 1000 kg/mo
Paint solids 0001/0003/0008/0035	PAINT BOOTHs	
Downdraft/Filter 0007/0008	GRINDING	
Glast media 0007/0008	BLASTING	
Aerosol Cans 0001	Aerosol Cans	

PAA tank Cleanouts 0007/0008
abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

(NI = Not inspected; N/A = Not applicable)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11)	262A	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	<input checked="" type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	<input type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d): 40 CFR 268.7(a)(5))	262C	<input type="checkbox"/>	NI N/A

IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)

3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	<input checked="" type="checkbox"/>	NI N/A
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MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:			
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
7. NOT APPLICABLE			
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3 rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	<input checked="" type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<input checked="" type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20)	262B	<input checked="" type="checkbox"/>	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a).			N/A
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:			
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A
PRATT & WHITNEY requirement - 2025 -> Zero waste			
13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A

**LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))**

YES NO

14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	268A	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	268A	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	<input checked="" type="checkbox"/> NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	<input type="checkbox"/> NI N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	<input type="checkbox"/> NI N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	<input type="checkbox"/> NI N/A
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19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
a) EPA hazardous waste #?	268A	<input checked="" type="checkbox"/> NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	<input checked="" type="checkbox"/> NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	<input checked="" type="checkbox"/> NI N/A
d) manifest number associated with the shipment?	268A	<input checked="" type="checkbox"/> NI N/A
e) waste analysis data, where available?	268A	<input checked="" type="checkbox"/> NI N/A
f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<input checked="" type="checkbox"/> NI N/A

UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	<input type="checkbox"/> NI N/A
h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	<input checked="" type="checkbox"/> NI N/A
20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3))		
a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	<input type="checkbox"/> NI N/A
b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	<input type="checkbox"/> NI N/A

NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	268A	<input checked="" type="checkbox"/> NI N/A
22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR 268.7(a)(7))	268A	<input type="checkbox"/> NI N/A
23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	268A	<input checked="" type="checkbox"/> NI N/A

NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	<input checked="" type="checkbox"/> NI N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR 268.40(c))	268A	<input type="checkbox"/> NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	<input checked="" type="checkbox"/> NI N/A
27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	<input checked="" type="checkbox"/> NI N/A

PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

		YES	NO
28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a): 40 CFR 262.30))	262C	<input checked="" type="checkbox"/> co.said <input checked="" type="checkbox"/> obsr'd	NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR 172 concerning hazardous materials (required before shipping waste off-site)? (Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	<input checked="" type="checkbox"/> co.said <input checked="" type="checkbox"/> obsr'd	NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR 172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	<input checked="" type="checkbox"/> co.said <input checked="" type="checkbox"/> obsr'd	NI N/A
31. If required (>1000 #s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<input checked="" type="checkbox"/> co.said <input checked="" type="checkbox"/> obsr'd	NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35) <i>Some in garbage bags</i>		<input checked="" type="checkbox"/> NO	
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A

OR

e) one of the following apply:			
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7): 40 CFR 262.34(g))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8): 40 CFR 262.34(h))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10): 40 CFR 262.34(i))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
g) are containers compatible with waste in them (265.172)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
h) are containers stored closed? (265.173(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI	N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI	N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input type="checkbox"/> <input type="checkbox"/> NI	N/A

Rule 306(2) & 40 CFR 262.34(c)(1) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:			
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
e) are container(s) in good condition? (265.171)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:			
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI	N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include			
a) impervious base free of cracks? (264.175(b)(1)) : <i>(supposed to be)</i>	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI	N/A

*liner is lifting - concrete beneath.
Could not evaluate for cracks*

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input checked="" type="checkbox"/>	NI	N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input checked="" type="checkbox"/>	NI	N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	<input checked="" type="checkbox"/>	NI	N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input checked="" type="checkbox"/>	NI	N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	<input checked="" type="checkbox"/>	NI	N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? Explain any yes answer.		<input checked="" type="checkbox"/>	NI	N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	<input checked="" type="checkbox"/>	NI	N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input checked="" type="checkbox"/>	NI	N/A
40. Is hazardous waste accumulated in tanks? If so, complete Tank System inspection form.		<input checked="" type="checkbox"/>	NI	N/A
41. Is hazardous waste placed on drip pads? If so, complete Wood Preserving inspection form		<input checked="" type="checkbox"/>	NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

42. Did personnel receive training? (265.16) Training Records partial	262C	<input checked="" type="checkbox"/>	NI	N/A
43. Do personnel training records contain the following:				
a) job title? (265.16(d)(1))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) job descriptions? (265.16(d)(2)) Not Specific to RCRA duties - Volunteer basis	262C	<input checked="" type="checkbox"/>	NI	N/A
c) name of employee filling each job? (265.16(d)(1))	262C	<input checked="" type="checkbox"/>	NI	N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	<input checked="" type="checkbox"/>	NI	N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	262C	<input checked="" type="checkbox"/>	NI	N/A
f) records of training? (265.16(d)(4))	262C	<input checked="" type="checkbox"/>	NI	N/A
g) do new personnel receive required training within 6 months? (265.16(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	<input checked="" type="checkbox"/>	NI	N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	<input checked="" type="checkbox"/>	NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	<input checked="" type="checkbox"/>	NI	N/A
45. If required, does this facility have the following:				
a) internal communications or alarm systems? (265.32(a))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/>	NI	N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input checked="" type="checkbox"/>	NI	N/A
46. Testing and Maintenance of Emergency Equipment				
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input checked="" type="checkbox"/>	NI	N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)				
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	<input checked="" type="checkbox"/>	NI	N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35) Not in 90 day	262C	<input checked="" type="checkbox"/>	NI	N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b))	262C	<input checked="" type="checkbox"/>	NI	N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	<input checked="" type="checkbox"/>	NI	N/A
49. Does the contingency plan contain the following:				
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	<input checked="" type="checkbox"/>	NI	N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	<input checked="" type="checkbox"/>	NI	N/A

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
Emergency Coordinator and Emergency Procedures:		
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
51. Contingency plan Amendments and Copies		
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	<input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		<input type="checkbox"/> <input type="checkbox"/> NI N/A
a) exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-h).	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114
ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:		
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

COMMENTS:

Jim Fitzgerald - operations manager.
 Gary Francis - alternate manager.

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	NO
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Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):

1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
2. The container capacity is less than .1 cubic meter (26 gallons)
3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
5. The unit is used solely to manage radioactive mixed waste
6. The unit is regulated by and operates in accordance with Clean Air Act regulations

***Note:** 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt

CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	NO
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General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
3. The unit is a tank used for certain biological treatment
4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3	265.1084	Waste Determination	Determination Not Needed	Determination Needed
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Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is not needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA= Not Applicable, NI= Not Inspected, OK= In Compliance, DF= Deficiency	NA	NI	OK	DF
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CONTAINER MANAGEMENT 265.1087

Level 1	Level 2	Level 3
Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process

CC-4	265.1087	Controls				
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One of the following:

- Use containers that meet DOT requirements
 - Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container
 - Use organic vapor suppression on or above the container
- 265.1087(c)

One of the following:

- Use containers that meet DOT requirements
 - Use containers that operate with no detectable emissions (method 21)
 - Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27)
- 265.1087(d)

- Containers used to stabilize H.W. with volatile organics greater than 500 ppm
 - For waste stabilized in a container either:
 1. container must be vented directly to a control device; or
 2. container is vented inside an enclosure which is exhausted through a closed vent to a control device
 - Conservation vents are not allowed
- 265.1087(b)(2)

Level 1		Level 2		Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency			NA	NI	OK	DF
CC-5	265.1087	Waste transfer requirements		N/A			
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)		Not applicable			
CC-6	265.1087	Operating requirements		OK			
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)				-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements		N/A			
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)				Inspection requirements are the same as for tanks			
CC-8	265.1087	Repair requirements		N/A			
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)				Necessary corrective measures shall be <u>immediately</u> implemented to ensure that the control device is operated in compliance			
CC-9	265.1090	Recordkeeping requirements		N/A			
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept		Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

Comments:



USED OIL INSPECTION FORM – GENERATORS

Facility's Name PRATT & WHITNEY AUTODAIR Part 8 RulesDate 8/19/15 ID# M10005343512 1994 PA 451

Note: Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable

YES NO

NI – Not Inspected, N/A – Not Applicable		YES	NO
1. Does the facility generate <u>used oil</u> and any of the following materials which are subject to regulation as used oil:		<input checked="" type="checkbox"/>	
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA		
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA		
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA		
d) mixture of used oil and fuel? (Rule 809(1)(d))	UOA		
e) material which is produced from used oil & is burned for energy recovery? (Rule 809(1)(e))	UOA		
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1)(f))			
i) maximum arsenic concentration of 5ppm	UOA		
ii) maximum cadmium concentration of 2ppm	UOA		
iii) maximum chromium concentration of 10ppm	UOA		
iv) maximum lead concentration of 100ppm	UOA		
v) minimum flash point of 100 degrees Fahrenheit	UOA		
vi) maximum total halogen concentration of 4,000ppm	UOA		
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA		
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA		<input checked="" type="checkbox"/>
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA		
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule 809(2)(b)(ii))	UOA		
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed? (Rule 809(2)(c))	UOA		
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA		
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809(2)(g))	UOA		
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809(2)(j))	UOA		
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m))	UOA		
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule 809(2)(o))	UOA		
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		<input checked="" type="checkbox"/>

No Chlorinated Solvents on-site.
(D039/0040 on manifest for parts washers - Safety Kleen)

GENERATOR REQUIREMENTS (Rule 810)

NOTE: Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25 gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4))	UOA	<input checked="" type="checkbox"/>	NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	<input checked="" type="checkbox"/>	NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	<input checked="" type="checkbox"/>	NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	<input checked="" type="checkbox"/>	NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	<input type="checkbox"/>	NI <input checked="" type="checkbox"/> N/A
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	<input type="checkbox"/>	NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	<input type="checkbox"/>	NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	<input type="checkbox"/>	NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	<input type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER (Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	<input type="checkbox"/>	NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour? (40 CFR 279.23(b))	UOA	<input type="checkbox"/>	NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	<input type="checkbox"/>	NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL (Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	<input checked="" type="checkbox"/>	NI N/A
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OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	<input type="checkbox"/>	NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	<input type="checkbox"/>	NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	<input type="checkbox"/>	NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA	<input type="checkbox"/>	NI N/A
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	<input type="checkbox"/>	NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	<input type="checkbox"/>	NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	<input type="checkbox"/>	NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	<input type="checkbox"/>	NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	<input checked="" type="checkbox"/>	NI N/A

COMMENTS:-

**Department of Environmental Quality
UNIVERSAL WASTE SMALL QUANTITY HANDLER
(SQH) INSPECTION**

Facility Name PRATT & WHITNEY AutoAir Part 2 Rules

Date 8/19/15 I.D. # MID005342512 1994 PA 451

SQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or less of all these wastes on site: antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.

Yes/No responses that are outside of the parenthesis are violations.

(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(4): 40 CFR 273.11)

		YES	NO
1. Does SQH dispose of universal waste? (Rule 228(4): 40 CFR 273.11(a))	273.B	<input checked="" type="checkbox"/>	NI N/A
2. Does SQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(4): 40 CFR 273.11(b))	273.B	<input checked="" type="checkbox"/>	NI N/A

WASTE MANAGEMENT (Rule 228(4): 40 CFR 273.13, 273.14)

ANTIFREEZE: (Rule 228(4))

QTY HANDLED:

3. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.B	<input type="checkbox"/>	NI N/A
4. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.B	<input type="checkbox"/>	NI N/A
5. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.B	<input type="checkbox"/>	NI N/A
6. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.B	<input type="checkbox"/>	NI N/A
7. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.B	<input type="checkbox"/>	NI N/A

BATTERIES: (Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h) requirements)

QTY HANDLED:

8. Are batteries managed in way to prevent releases? (Rule 228(4)(a): 40 CFR 273.13(a))	273.B	<input checked="" type="checkbox"/>	NI N/A
9. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR 273.13(a)(1))	273.B	<input type="checkbox"/>	NI N/A
10. Does the handler do any of the following activities w/ batteries as long as the casings of each battery is not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(4)(a): 40 CFR 273.13(a)(2))	273.B	<input type="checkbox"/>	NI N/A
11. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/>	NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/>	NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(4)(a): 40 CFR 273.13(a)(3))	273.B	<input type="checkbox"/>	NI N/A
12. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(4)(a): 40 CFR 273.14(a))	273.B	<input checked="" type="checkbox"/>	NI N/A

CONSUMER ELECTRONICS: (Rule 228(4))

QTY HANDLED:

13. Are electronics managed in a manner that prevents breakage or the release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.B	<input type="checkbox"/>	NI N/A
14. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.B	<input type="checkbox"/>	NI N/A
15. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.B	<input type="checkbox"/>	NI N/A
16. Does handler do anything beyond any of the following: repair electronics for direct reuse (Rule 228(4)(g)(i)); remove other univ. wastes from cons. electronics (Rule 228(4)(g)(ii)); remove modular components for reuse (Rule 228(4)(g)(iii))	273.B	<input type="checkbox"/>	NI N/A

*Shipped back to East Hartford, CN
Leaded Electronics.*

ELECTRIC LAMPS: (Rule 228(4); 273.13(c); 273.14(d))**QTY HANDLED:**

17. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(i)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
18. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(4)(c)(iii))	273.B	<input checked="" type="checkbox"/> NI N/A
19. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(4)(c)(iv)) <i>Note: different from EPA regulation</i>	273.B	<input checked="" type="checkbox"/> NI N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(4)(c)(iii)) <i>Note: different from EPA regulation</i>	273.B	<input type="checkbox"/> NI N/A
21. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(4)(c)(iii)(B)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272?	273.B	<input type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451?	273.B	<input type="checkbox"/> NI N/A

MERCURY DEVICES: (Rule 228(4); 40 CFR 273.13 & 273.14)**QTY HANDLED:**

22. Are devices managed to prevent releases? (Rule 228 (4)(d): 40 CFR 273.13(c))	273.B	<input type="checkbox"/> NI N/A
23. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (4)(d): 40 CFR 273.13(c)(1))	273.B	<input type="checkbox"/> NI N/A
24. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (4)(d): 40 CFR 273.14(d))	273.B	<input type="checkbox"/> NI N/A
25. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(i & ii))	273.B	<input type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(iii & iv))	273.B	<input type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(v))	273.B	<input type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vi))	273.B	<input type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(vii))	273.B	<input type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (4)(d): 40 CFR 273.13(c)(2)(viii))	273.B	<input type="checkbox"/> NI N/A
26. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (4)(d): 40 CFR 273.13(c)(3))	273.B	<input type="checkbox"/> NI N/A
27. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (4)(d): 40 CFR 273.13(c)(3)(i)(A&B), 273.13(c)(4)(i))	273.B	<input type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (4)(d): 40 CFR 273.13(c)(4)(ii))	273.B	<input type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (4)(d): 40 CFR 273.13(c)(4)(iii))	273.B	<input type="checkbox"/> NI N/A

PESTICIDES: Rule 228(4) adopts 40 CFR 273 except 273.10 & 273.18(h)**QTY HANDLED:**

28. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(4)(a): 40 CFR 273.13(b)(1))	273.B	<input type="checkbox"/> NI N/A
29. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(4)(a): 40 CFR 273.13(b)(2))	273.B	<input type="checkbox"/> NI N/A
30. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(4)(a): 40 CFR 273.13(b)(3))	273.B	<input type="checkbox"/> NI N/A
31. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(4)(a): 40 CFR 273.13(b)(4))	273.B	<input type="checkbox"/> NI N/A
32. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(S)" or "WASTE-PESTICIDE(S)" (Rule 228(4)(a): 40 CFR 273.14(b) [See 273.14(c) if 273.14(b) not possible]	273.B	<input type="checkbox"/> NI N/A

PHARMACEUTICALS: (Rule 228(4))**QTY HANDLED:**

33. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.B	<input type="checkbox"/> NI N/A
34. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.B	<input type="checkbox"/> NI N/A

35. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.B	<input type="checkbox"/> NI N/A
36. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.B	<input type="checkbox"/> NI N/A

ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)

37. Is universal waste accumulated one year or less? (Rule 228(4)(a): 40 CFR 273.15(a)) (if no go to question 38)	273.B	<input checked="" type="checkbox"/> NI N/A
38. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal? (burden on handler to demonstrate) (Rule 228(4)(a): 40 CFR 273.15(b))	273.B	<input type="checkbox"/> NI N/A
39. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(4)(a): 40 CFR 273.15(c)(1))	273.B	<input checked="" type="checkbox"/> NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(4)(a): 40 CFR: 273.15(c)(2))	273.B	<input type="checkbox"/> NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(4)(a): 40 CFR 273.15(c)(3))	273.B	<input type="checkbox"/> NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4)(a): 40 CFR (273.15(c)(4))	273.B	<input type="checkbox"/> NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(4)(a): 40 CFR (273.15(c)(5))	273.B	<input type="checkbox"/> NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(4)(a): 40 CFR (273.15(c)(6))	273.B	<input type="checkbox"/> NI N/A

EMPLOYEE TRAINING (Rule 228(4): 40 CFR 273.16)

40. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(4): 40 CFR 273.16))	273.B	<input checked="" type="checkbox"/> NI N/A
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RESPONSE TO RELEASE (Rule 228(4): 40 CFR 273.17)

41. Are releases of universal waste & other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	273.B	<input type="checkbox"/> NI N/A
42. Is material from release characterized? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> NI N/A
43. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(4): 40 CFR 273.17(b))	273.B	<input type="checkbox"/> NI N/A

OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18

44. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4)(a): 273.18(a))	273.B	<input checked="" type="checkbox"/> NI N/A
45. If the SQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(4)(b))	273.B	<input type="checkbox"/> NI N/A
46. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(4)(a): 273.18(c))	273.B	<input type="checkbox"/> NI N/A
47. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(4)(a): 40CFR 273.18(d))	273.B	<input checked="" type="checkbox"/> NI N/A
48. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(4)(a): 40 CFR 273.18(e)(1))	273.B	<input type="checkbox"/> NI N/A
b. agree to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(e)(2)	273.B	<input type="checkbox"/> NI N/A
49. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(4)(a): 40 CFR 273.18(f)(1)) OR	273.B	<input type="checkbox"/> NI N/A
b. agreeing to where shipment will be sent? (Rule 228(4)(a): 40 CFR 273.18(f)(2))	273.B	<input type="checkbox"/> NI N/A
50. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(4)(a): 40 CFR 273.18(g))	273.B	<input type="checkbox"/> NI N/A
51. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(4)(a): 40 CFR 273.18(h))	273.B	<input type="checkbox"/> NI N/A

EXPORTS (Rule 228(4): 40 CFR 273.20)

52. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20(a))	273.B	<input type="checkbox"/> NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(4): 40 CFR 273.20(b))	273.B	<input type="checkbox"/> NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20(c))	273.B	<input type="checkbox"/> NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

53. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [] NI N/A
54. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [] NI N/A
55. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[] ___ NI N/A
56. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[] ___ NI N/A
57. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? <i>Shipping papers cannot describe universal waste as "hazardous waste, (I) or (s), n.o.s."</i> <i>nor have waste added to USDOT proper shipping name.</i> (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[] ___ NI N/A
58. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[] ___ NI N/A
a. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D	[] ___ NI N/A
b. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[] ___ NI N/A

COMMENTS:

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Appendix C

Documents received during the Inspection:

- Site Diagrams for Plants 1-4
Note: Plant 4 is under a
separate EPA ID number
 - Pratt and Whitney reviewed
and released photographs.
-

Inspection Date:

August 19, 2015

Facility Name and ID Number:

Pratt & Whitney

MID005343512

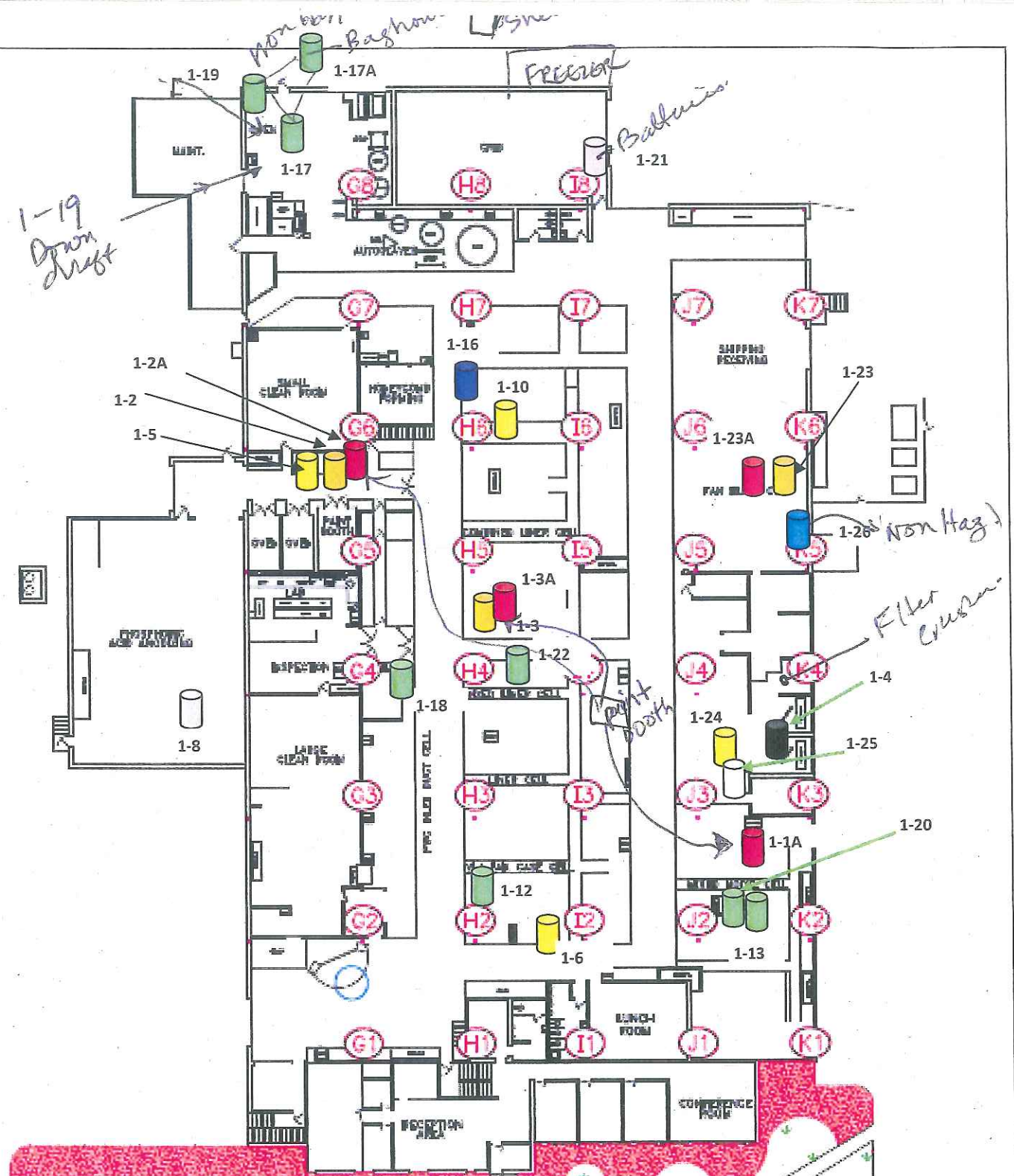
Inspector:

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division



	Materials Contaminated with Paint		Used Shop Towels, Rags and Solvent Wipes		Blue Ice		Condensate Water
	Waste Paint/Solvent and Paint Gun Cleaner		Alodine Rinse		Universal Waste		Sol Gel Waste
	Residue from Aerosol Can Punching		Media Blast				

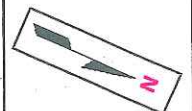
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DATE AUGUST 2014

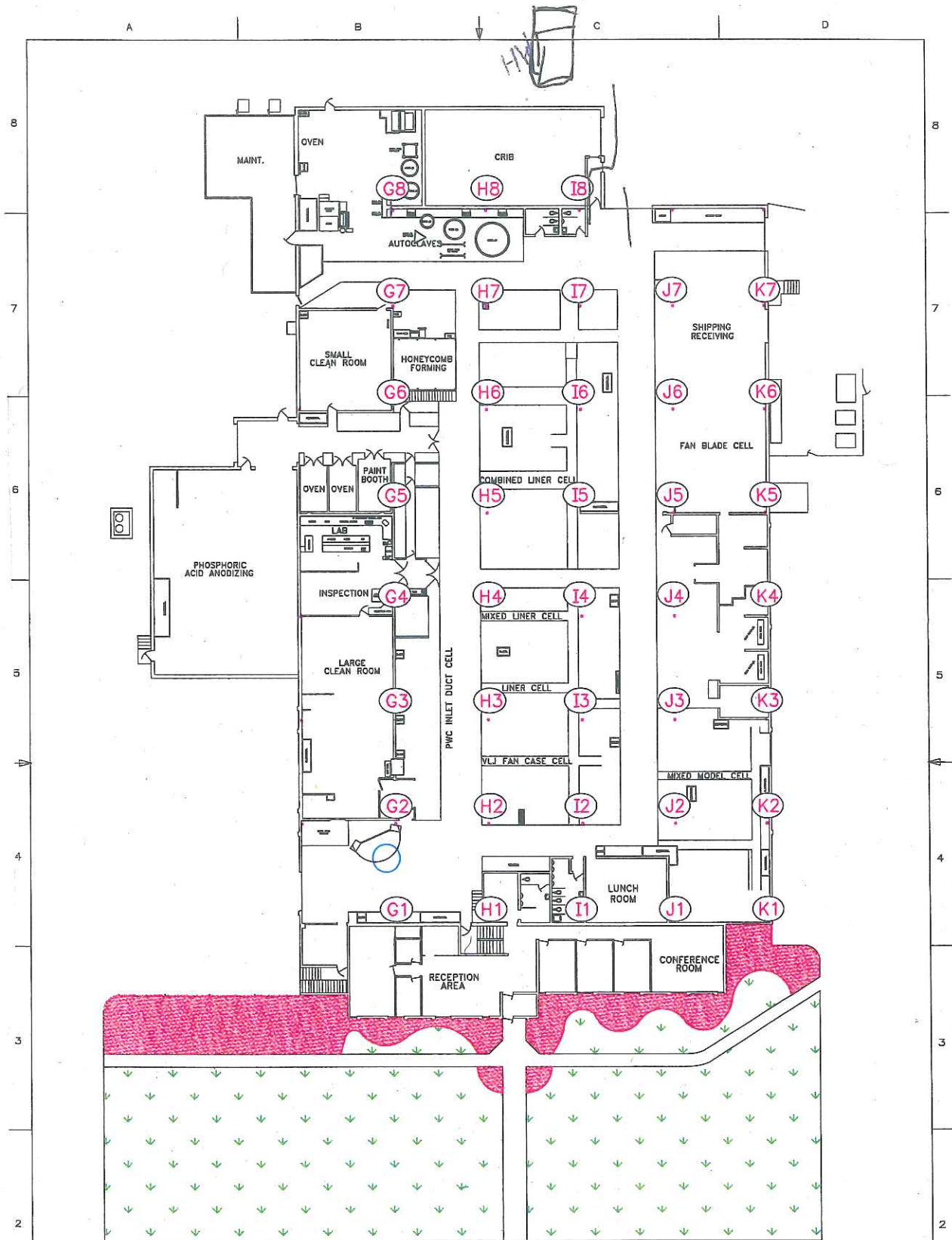
POG LOCATIONS

Pratt & Whitney AutoAir, Inc.

PLANT 1

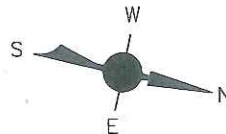


This document does not contain any export regulated technical data



(X1) - COLUMN MARKER

PLANT #1
5640 ENTERPRISE DRIVE
LANSING, MI 48911



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THIRD ANGLE PROJECTION
UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES
TOLERANCES SHALL BE:
FRACTIONS DECIMALS
1/16 ±.005
1/32 ±.003
1/64 ±.002
1/8 ±.003
1/4 ±.005
1/2 ±.007
1 ±.010
2 ±.015
4 ±.020
8 ±.030
16 ±.040
32 ±.050
64 ±.060
128 ±.070
256 ±.080
512 ±.090
1024 ±.100
SURFACE FINISH 125/
DRILLED, COUNTERBORED, AND SPOTFACED HOLES:
NO 30 THRU 1/4" +.005/-0.002
NO 30 THRU 1-1/2" +.012/-0.003
DO NOT SCALE DRAWING

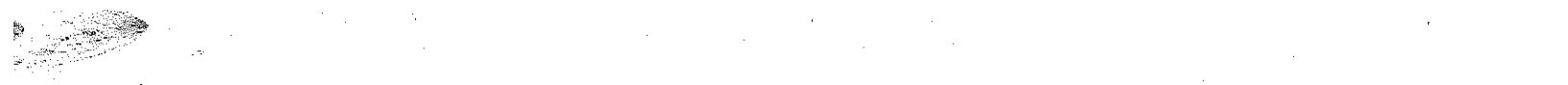
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DESIGN	S. MAXSON	08-June-09
DRAWN	J. BARKER	
CHECKED		
IN CHARGE		
REVISIONS		
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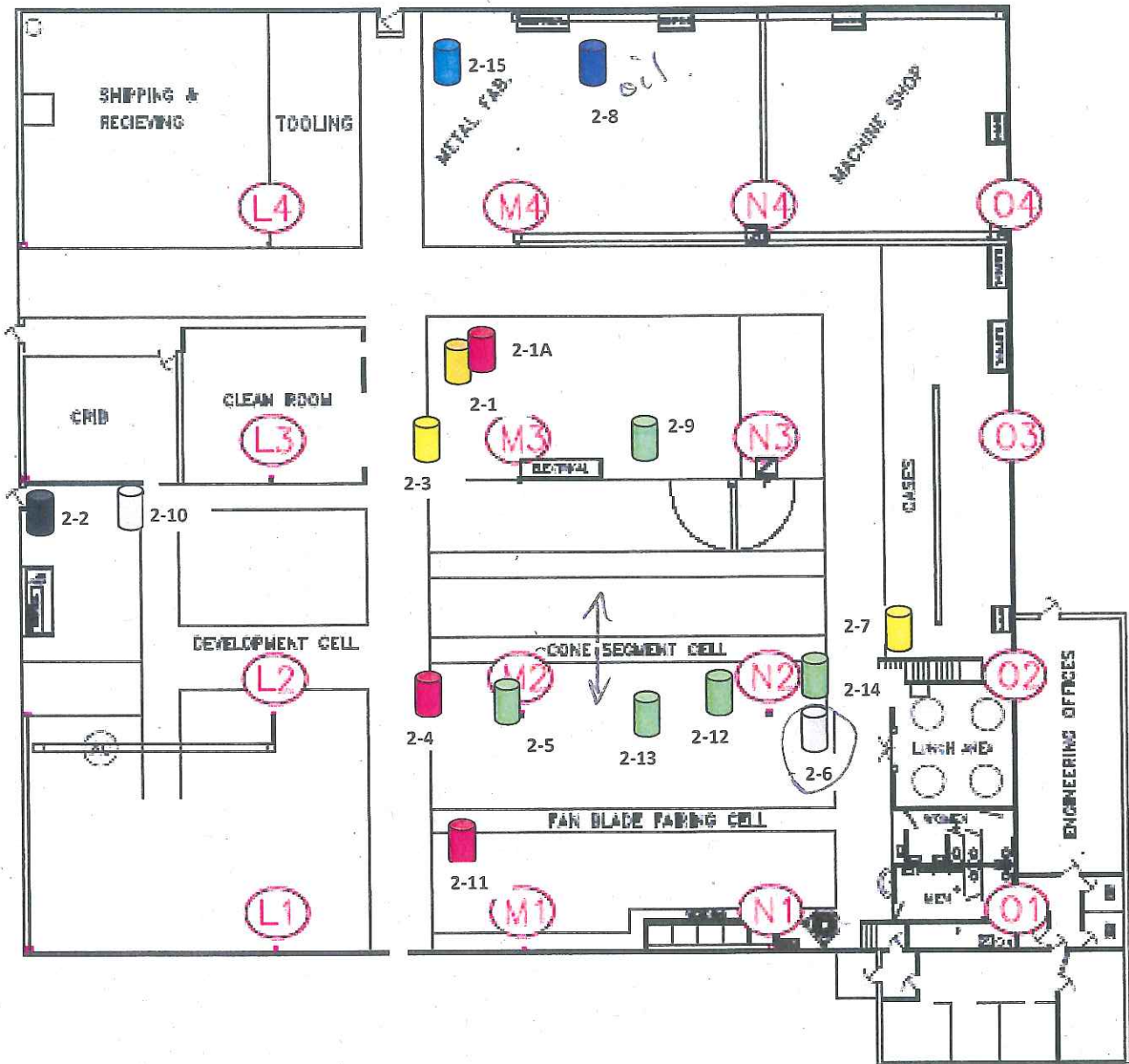
Pratt & Whitney
AutoAir

DRAWING NAME P#1
COLUMN - ROW
LOCATIONS

SIZE: FROM NO. DRAWING NO.
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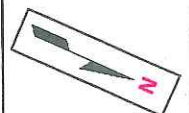
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DATE June 2015

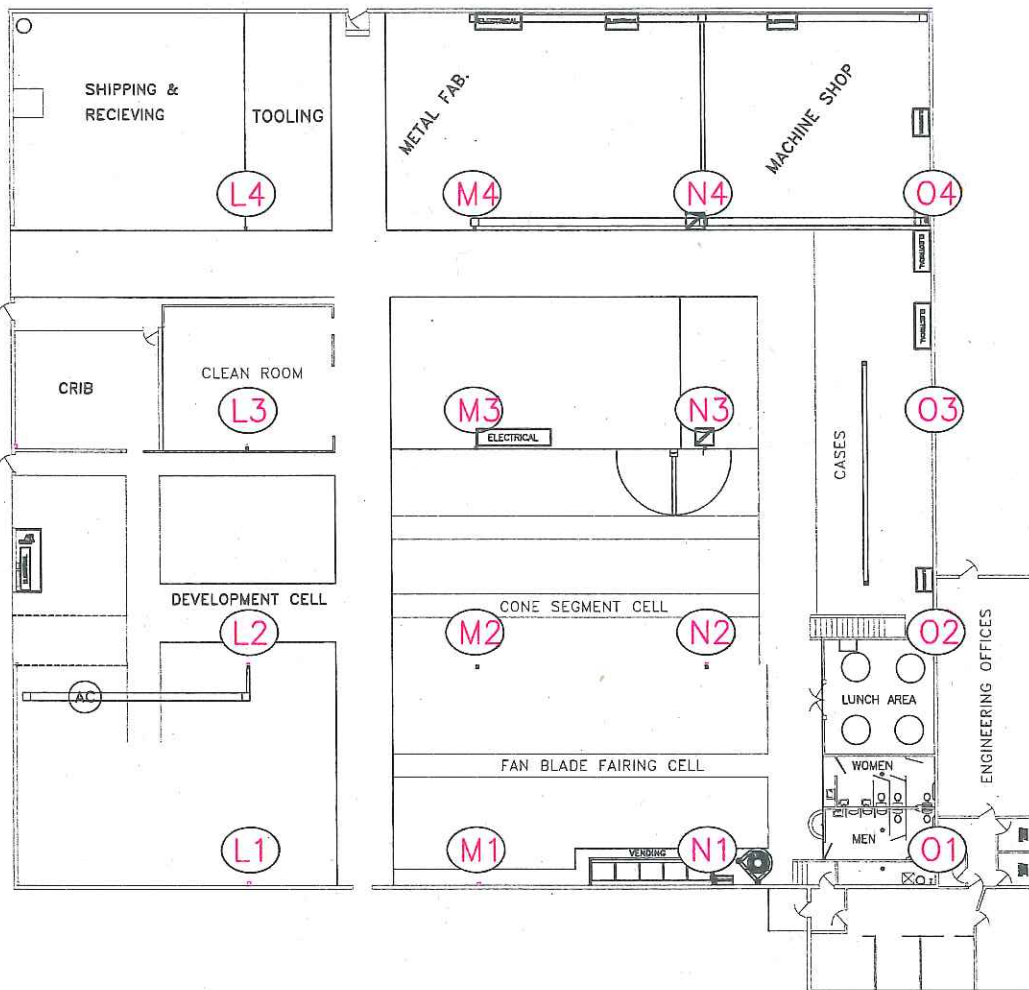
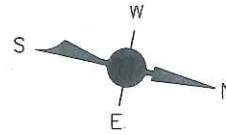
POG LOCATIONS

Pratt & Whitney AutoAir, Inc.

PLANT 2



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PLANT #2
1540 KEYSTONE DRIVE
LANSING, MI 48911

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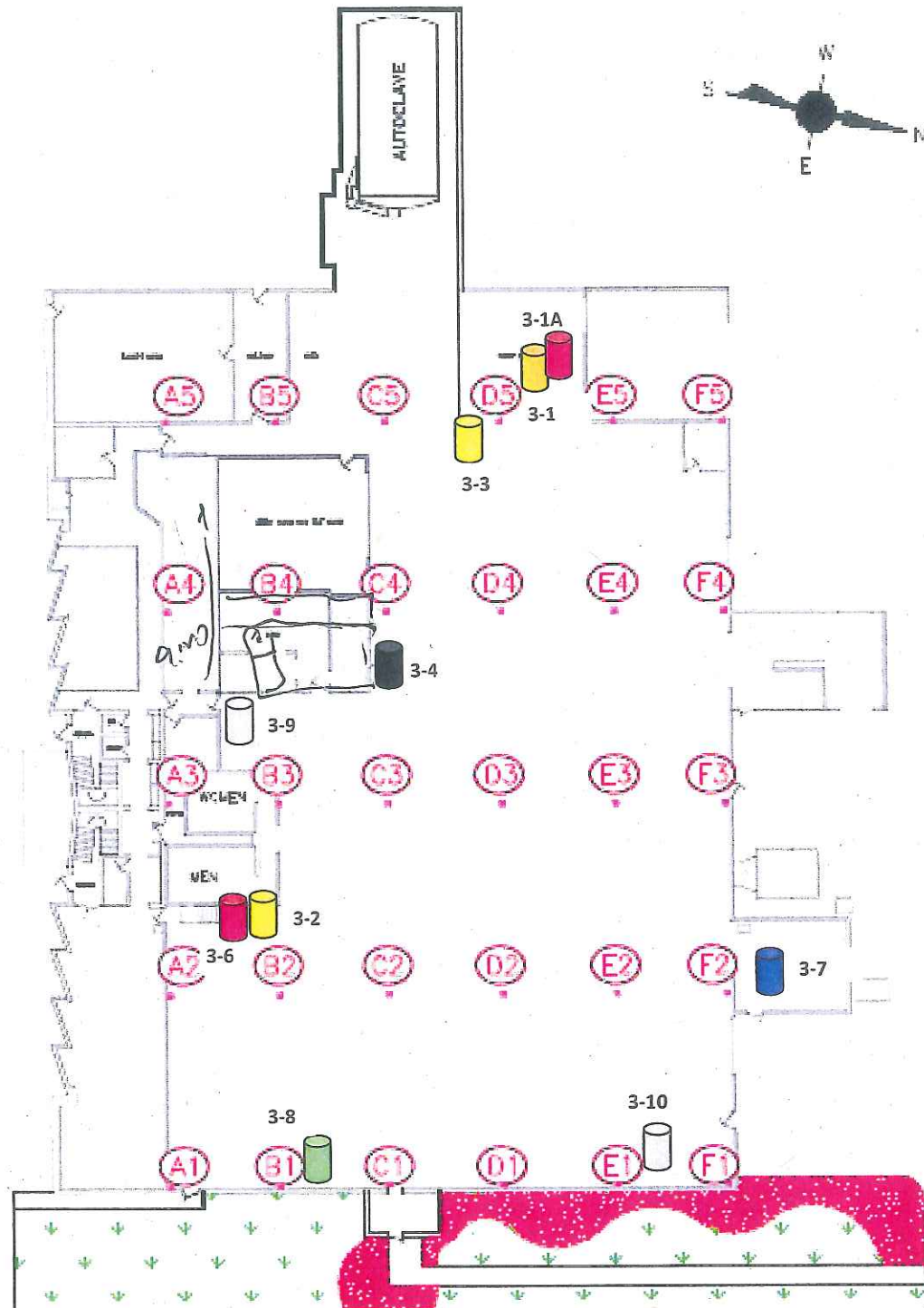
THIRD ANGLE PROJECTION
UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES
TOLERANCES SHALL BE:
X .03
XX .05
XXX .010
ANGLES 1.0° 125°
SURFACE FINISH
DRAILED, COUNTERBORED,
AND SPOTFACED VALUES
NO 30 THRU 1/8 +.005/-0.02
NO 30 THRU 1-1/2 +.012/-0.03
DO NOT SCALE DRAWING









APPROVALS
DESIGN S. MAXSON
FIELD J. BARKER
REVISIONS
REVISION 11-01-28

DATE 08-June-09
APPROVALS
RECORDED
PER ET-305

Pratt & Whitney
AutoAir
DRAWING NAME P#2
COLUMN - ROW
LOCATIONS
D 05986 P2_Col_Rows
SCALE: NONE REV - 1 AUTOD V-3028 SH 1 OF 1

DWG RELEASE LEVEL: ---



- | | | | | | |
|---|---|---|--|---|-----------------|
|  | Materials Contaminated with Paint |  | Used Shop Towels, Rags and Solvent Wipes |  | TR Washwater |
|  | Waste Paint/Solvent and Paint Gun Cleaner |  | Used Oil |  | Universal Waste |
|  | Residue from Aerosol Can Punching |  | Media Blast | | |

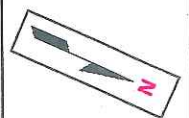
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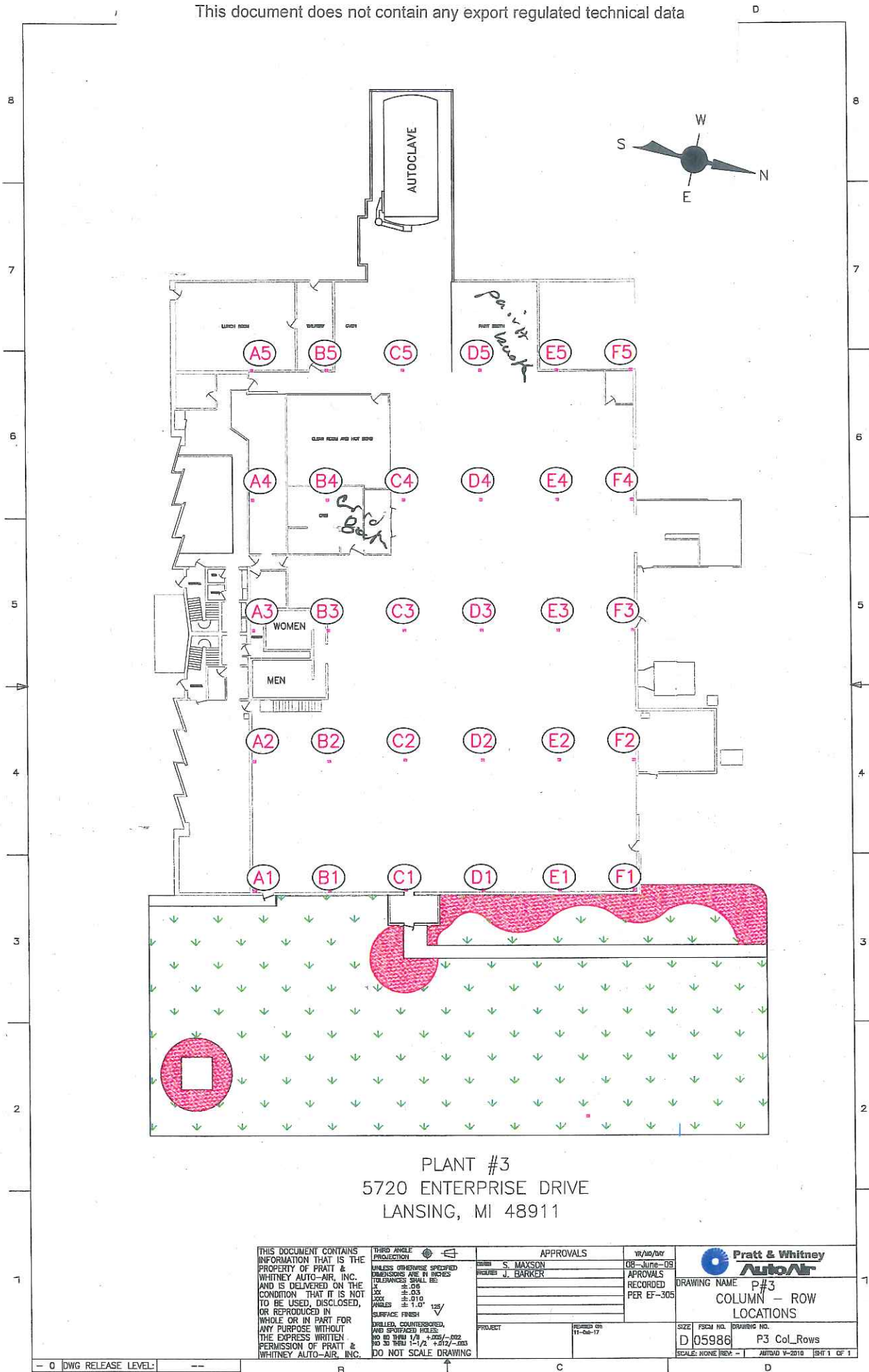
DATE AUGUST 2014

POG LOCATIONS

Pratt & Whitney AutoAir, Inc.

PLANT 3





PLANT #3
5720 ENTERPRISE DRIVE
LANSING, MI 48911

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THIRD ANGLE PROJECTION
UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES
TOLERANCES SHALL BE:
XX ±.03
XXX ±.010
XXXX ±.015
SURFACE FINISH 125/
HOLLOW, COUNTERBORED, AND SPOTFACED HOLES:
NO 10 THRU 1/8" +.005/-002
NO 30 THRU 1-1/2" +.012/-003
DO NOT SCALE DRAWING

APPROVALS		DATE
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REVIEW	J. BARKER	
RECORDED		PER EF-305
PROJECT		
REVISIONS		
11-04-17		

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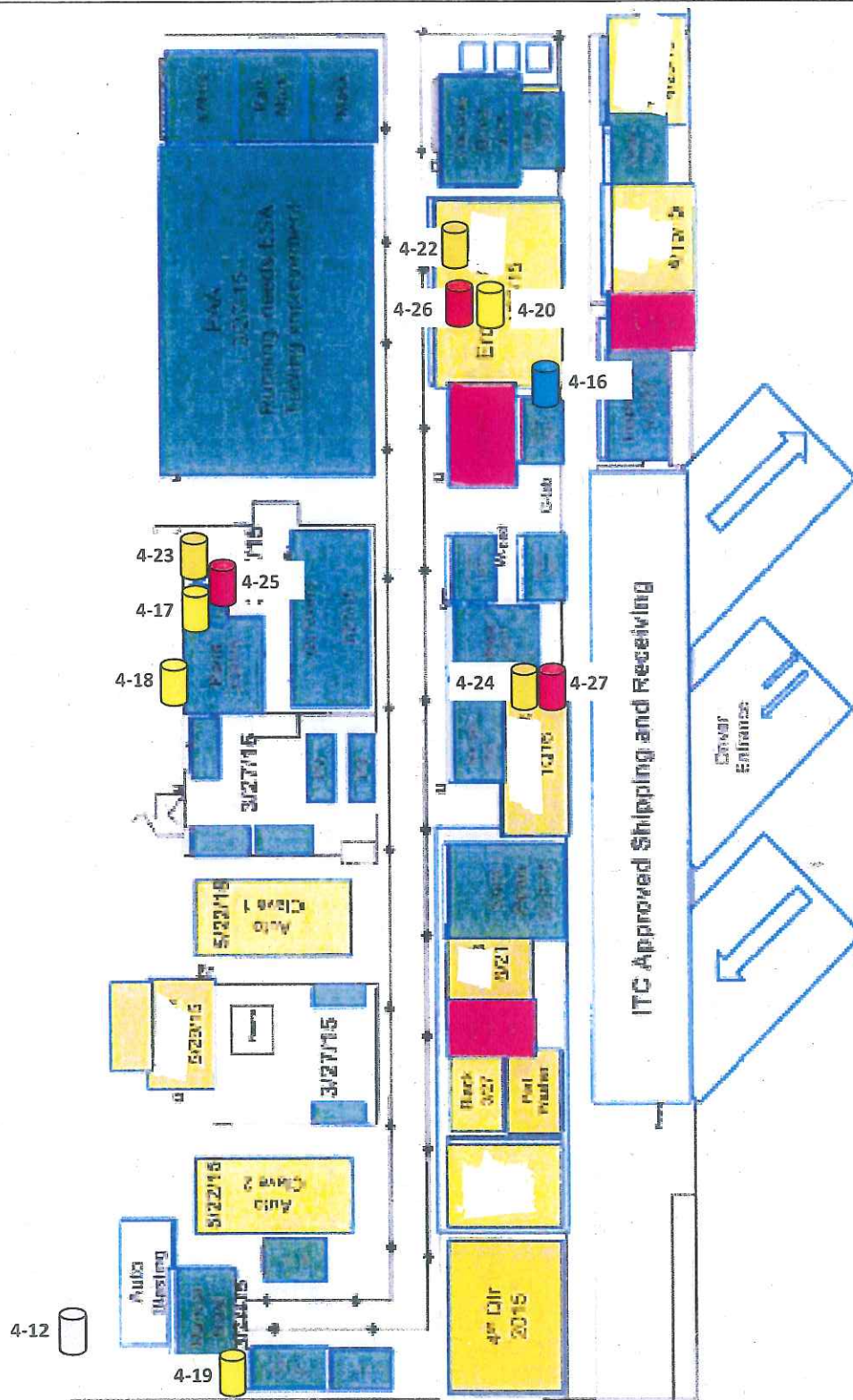
Updated 6/5/15

Non-Haz



See the "Plant 4 Equipment Move document" that details the equipment to be moved. Each piece of equipment is labeled with a number that corresponds to the number in the document.

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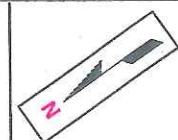


- | | | | | | |
|---|---|---|--|---|------------------|
|  | Materials Contaminated with Paint |  | Used Shop Towels, Rags and Solvent Wipes |  | Universal Waste |
|  | Waste Paint/Solvent and Paint Gun Cleaner |  | Alodine Rinse |  | Condensate Water |

SCALE NOT TO SCALE

DATE JUNE 2015

POG LOCATIONS
Pratt & Whitney AutoAir, Inc.
PLANT 4 Blades



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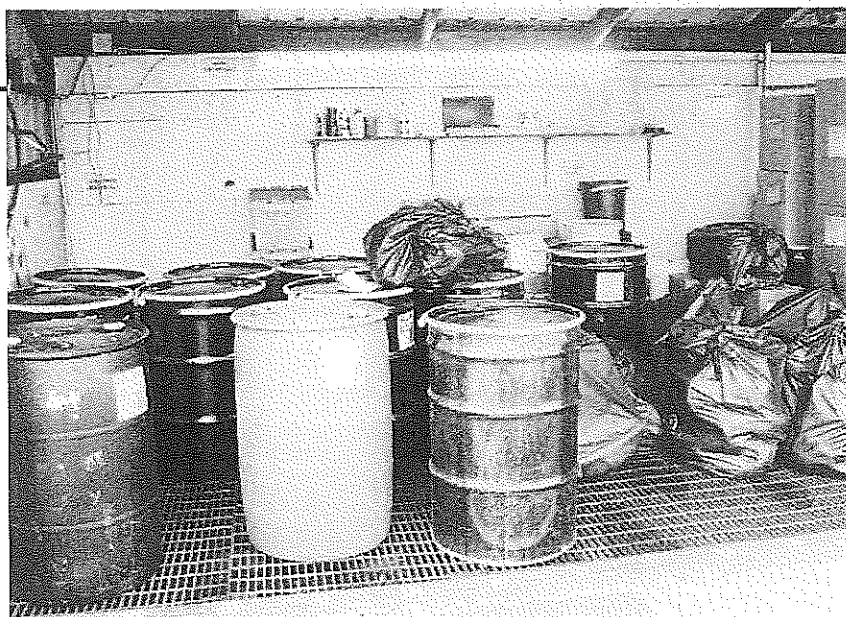
Pratt & Whitney

A United Technologies Company

BAER Reviewed Pictures

8/24/2015

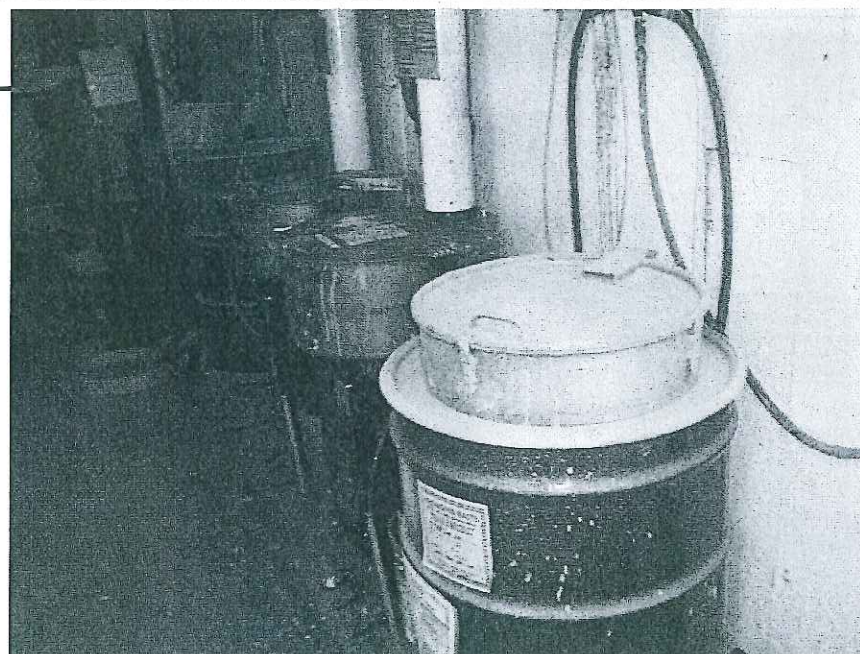
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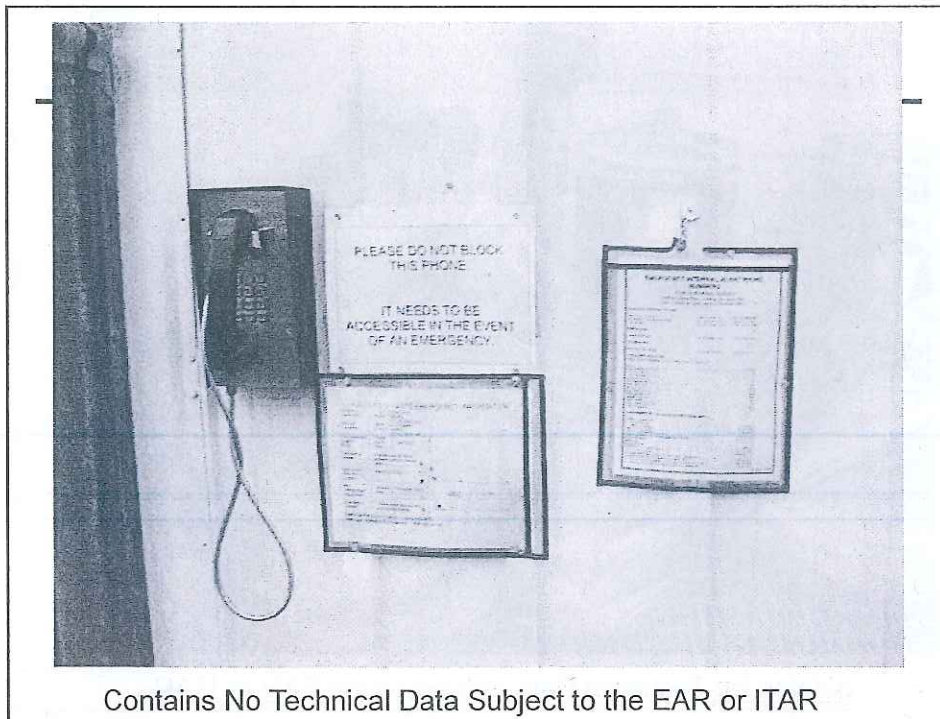
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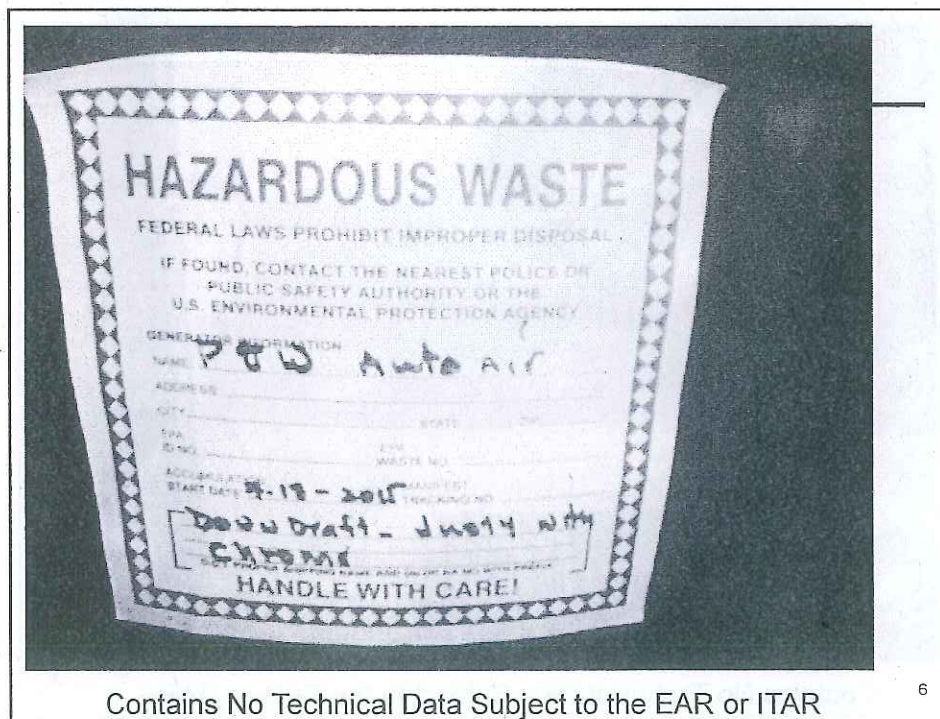
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